1 JENNIFER BERGH Nevada Bar No. 14480 2 **QUILLING SELANDER LOWNDS** WINSLETT & MOSER, P.C. 3 2001 Bryan Street, Suite 1800 4 Dallas, Texas 75201 (214) 560-5460 5 (214) 871-2111 Fax ibergh@gslwm.com 6 Counsel for Trans Union LLC 7 \*\*Designated Attorney for Personal Service\*\* Trevor Waite, Esq. 8 Nevada Bar No.: 13779 9 6605 Grand Montecito Parkway, Suite 200 Las Vegas, Nevada 89149 10 11 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA 12 13 JESUS GONZALEZ, Case No. 2:21-cv-01068-APG-BNW Plaintiff, 14 JOINT MOTION AND ORDER EXTENDING DEFENDANT TRANS 15 UNION LLC'S TIME TO FILE AN CLARITY SERVICES, INC., EQUIFAX ANSWER OR OTHERWISE 16 INFORMATION SERVICES, LLC, **RESPOND TO PLAINTIFF'S** EXPERIAN INFORMATION SOLUTIONS, 17 **COMPLAINT (FIRST REQUEST)** INC., NATIONAL CONSUMER TELECOM & UTILITIES EXCHANGE, TRANS UNION, 18 LLC, PLAIN GREEN, LLC, 2233 PARADISE 19 ROAD, LLC, d/b/a CASH FACTORY USA, CONN APPLIANCES, INC., GREAT 20 AMERICAN FINANCE HOLDINGS, LLC. AT&T MOBILITY, LLC, and COX 21 COMMUNICATIONS LAS VEGAS, INC. 22 Defendants. 23 Plaintiff Jesus Gonzalez ("Plaintiff") and Defendant Trans Union LLC ("Trans Union"), 24 by and through their respective counsel, file this Joint Motion Extending Defendant Trans 25 Union's Time to File an Answer or Otherwise Respond to Plaintiff's Complaint. 26 1. On June 7, 2021, Plaintiff filed his Complaint. The current deadline for Trans 27 Union to answer or otherwise respond to Plaintiff's Complaint is August 6, 2021. 28

- 2. On August 6, 2021, counsel for Trans Union communicated with Plaintiff's counsel regarding an extension within which to file a response to the Complaint, and Plaintiff's counsel agreed to the extension.
- 3. The parties will actively discuss a potential early resolution of this case, and the parties believe an extension of this nature may save waste of the parties' time and expense. The additional time will allow Plaintiff and Trans Union time to fully explore such early settlement discussions. Moreover, Trans Union's counsel will need additional time to review the documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made in good faith and not for the purposes of delay.
- 4. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or otherwise respond to Plaintiff's Complaint up to and including September 3, 2021. This is the first motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

  Dated this 6<sup>th</sup> day of August 2021.

## QUILLING SELANDER LOWNDS WINSLETT & MOSER, P.C.

## /s/ Jennifer Bergh

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IT IS SO ORDERED

**DATED: August 09, 2021** 

## FREEDOM LAW FIRM AND KIND LAW

Brend Weksler

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

George Haines Nevada Bar No. 9411 Gerardo Avalos Nevada Bar No. 15171

/s/ Michael Kind

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